

I am opposed to the petition for rulemaking RM-10870, filed by the National Conference of Volunteer Examiner Coordinators. I am opposed to its proposal to eliminate Element 1 (the 5 wpm Radiotelegraph Code Element) from the licensing process. This is because I believe the Radiotelegraph Code is an important enabler for Radio Amateurs interested in constructing their own apparatus, and because it is one of the most spectrum-efficient modes available that can be accessed with simple equipment. I am also opposed to the proposed requirement that licensees with the introductory class license called 'Communicator') be required to use commercially manufactured equipment. Because one of the purposes of the Amateur Radio Service is 'Expansion of the existing reservoir within the Amateur Radio Service of trained operators, technicians, and electronic experts', the requirement to use commercially manufactured apparatus is at odds with the reason why Amateur Radio exists at all. The Radio Amateur should be encouraged to cultivate the skill of building his or her own apparatus. And because of the relative simplicity of apparatus for the Radiotelegraph Code, skill in that mode should continue to be encouraged.

Thank you for the opportunity to comment.

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